

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,)
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES)
FOR THE STATE OF OKLAHOMA,)
Plaintiff,)
vs.) 4:05-CV-00329-TCK-SAJ
TYSON FOODS, INC., et al,)
Defendants.)

THE VIDEOTAPED 30(b)(6)
DEPOSITION OF LEASEA BUTLER, produced as a
witness on behalf of the Plaintiff in the above
styled and numbered cause, taken on the 22nd day of
August, 2007, in the City of Fayetteville, County of
Washington, State of Arkansas, before me, Lisa A.
Steinmeyer, a Certified Shorthand Reporter, duly
certified under and by virtue of the laws of the
State of Oklahoma.

Exhibit 27

TULSA FREELANCE REPORTERS
918-587-2878

35ec3c2d-3c39-4c79-a812-03a63e89893a

1 Q And how are those -- or how is the farm
2 management program communicated to the producer?

3 A Service reports.

4 Q And in addition to the service reports, is it
5 also discussions that the producer might have with
6 the service tech?

09:23AM

7 A Yes.

8 Q Now, is that the proper name? I'm talking
9 about the person from the company that comes out on
10 a periodic, perhaps weekly, basis to inspect the
11 facilities, look at the birds, that type of a
12 program?

09:23AM

13 A Service techs?

14 Q Yeah.

15 A Yes.

09:23AM

16 Q And that's the proper name for it. Now, Cobb
17 also provides all of the feed; is that correct?

18 A Yes.

19 Q Provides all of the medications that the birds
20 are to use?

09:23AM

21 A Yes.

22 Q Any type of sanitizers or chemicals used for
23 insect control, Cobb provides that; correct?

24 A Yes.

25 Q In addition to -- for the producer, the

09:24AM

1 referring to grandparent?

2 A Yes.

3 Q What other types of contracts does Cobb have,
4 and I'm talking about producing contracts? I'm sure
5 Cobb has all sorts of contracts.

09:37AM

6 A Right. We have a GP pullet contract. We also
7 have a lease contract in Georgia. That's the only
8 ones I'm recalling.

9 Q All right. In your -- your company requires
10 that the barns or the grow-out facilities be cleaned
11 out at the end of each flock; is that correct?

09:37AM

12 MR. GEORGE: Object to form.

13 A Yes, unless otherwise specified. We have used
14 built-up litter in some instances.

15 Q But the contract requires it to be cleaned out
16 at the end of the flock; is that correct?

09:38AM

17 MR. GEORGE: Object to form.

18 A Yes.

19 Q Okay, and if I read your guides, they also
20 provide for cleaning out the barn at the conclusion
21 of each flock, don't they?

09:38AM

22 A Yes.

23 Q And also require that the barn go through not
24 only a thorough cleaning but actually a sanitizing?

25 A We provide that, yes.

09:38AM